

From: [Jennifer Allim](#)
To: [Carlisle, Marie L.](#)
Cc: [Helen Chaitman](#); [Smith, Rachel M.](#); [Sinclair, Jordan](#)
Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079
Date: Tuesday, August 02, 2016 2:39:09 PM

Hi Marie:

In addition to the deposition dates I sent to you on Friday, for Adv. Pro. Nos.: 10-04768, Placon2; 10-04428, Meisels; 10-05079, Goodman; and 10-04614, Whitman, I have conferred with Mr. Horowitz, Adv. Pro. No. 10-04748 and he is available on Friday, October 21st in NYC.

Please extend discovery for the remaining proceedings:

APN 10-04728- Picard v. DiGiulian 2016	August 11,
APN 10-04541- Picard v. Perlman 2016	August 15,
APN 10-04818- Picard v. Harwood 2016	August 18,
APN 10-04914- Picard v. Gordon 2016	August 29,
APN 10-04826- Boyer Palmer 2016	September 1,
APN 10-04644- Russell Dusek 2016	September 6,

I will continue to send you proposed dates for depositions in all matters as received.

Thanks so much.
Jennifer

Jennifer Allim
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From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]
Sent: Tuesday, August 02, 2016 2:25 PM
To: Jennifer Allim <jallim@chaitmanllp.com>
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>; Sinclair, Jordan <jsinclair@bakerlaw.com>

Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Good afternoon Jennifer.

I wanted to follow up on your email to see if you have been able to determine any additional deposition dates for the top three adversary proceedings listed below. I am out of town, but am able to check email. If you are not able to obtain dates, but anticipate that we will need to extend discovery to accommodate Defendants' depositions, please let me know. We can enter into an informal agreement to extend, with the date to be determined and a case management notice prepared once we have the deposition dates.

Thanks,

Marie

Sent via the Samsung Galaxy S® 6, an AT&T 4G LTE smartphone

----- Original message -----

From: Jennifer Allim <jallim@chaitmanllp.com>

Date: 7/29/16 10:18 PM (GMT+01:00)

To: "Carlisle, Marie L." <mcarlisle@bakerlaw.com>

Cc: Helen Chaitman <hchaitman@chaitmanllp.com>

Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Please see the attached for the proposed dates that I was able to obtain so far. As indicated in the attachment, I am working on coordinating with the remaining clients for whom you have requested dates.

Jennifer Allim

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From: Carlisle, Marie L. [<mailto:mcarlisle@bakerlaw.com>]

Sent: Friday, July 29, 2016 4:08 PM

To: Jennifer Allim <jallim@chaitmanllp.com>

Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Smith, Rachel M. <rsmith@bakerlaw.com>;

Hunt, Dean D. <dhunt@bakerlaw.com>

Subject: RE: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Jennifer,

As I mentioned the other day, I will be out of the office beginning on Monday, with limited availability after Monday evening. Fact discovery will be closing in the next few weeks in the following adversary proceedings for which I've asked you to supplement discovery and provide deposition dates.

APN 10-04728 DiGiulian	08/11/16
APN 10-04748 Horowitz	08/12/16
APN 10-04541 Kenneth Perlman	08/15/16
APN 10-04768 Placon2	08/15/16

I am relying on your representation below that you are working on obtaining new deposition dates for these and other cases and that you will have them to me by Monday. If we have the new deposition dates by Monday, I can have my office turn around new case management plans next week for approval and filing. If you are unable to get the dates to me by Monday, and can assure me that you will provide new dates by the time I return on August 10th, then we will agree to informally extend fact discovery deadlines in these cases and, upon my return, can assess the status of discovery and amend case management plans to accommodate your clients' new deposition dates.

Please let me know if you are in agreement with this approach. I am available this afternoon if you would prefer to discuss.

Thanks,

Marie

From: Jennifer Allim [<mailto:jallim@chaitmanllp.com>]
Sent: Thursday, July 28, 2016 5:36 PM
To: Carlisle, Marie L.
Cc: Helen Chaitman
Subject: FW: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

Hi Marie:

Amended responses for Adv. Pro. No. 10-05079, Picard v. Goodman have been submitted.

I am working on obtaining client availability for depositions and should get them to you by Monday, as discussed.

Best,

Jennifer

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From: Sarah Howell
Sent: Thursday, July 28, 2016 6:30 PM
To: dsheehan@bakerlaw.com; ncremona@bakerlaw.com; mcarlisle@bakerlaw.com; dhunt@bakerlaw.com
Cc: Helen Chaitman <hchaitman@chaitmanllp.com>; Jennifer Allim <jallim@chaitmanllp.com>
Subject: SERVICE OF COURT DOCUMENTS(S); ADV. PRO. NO. 10-05079

NAME OF COURT:	U.S. Bankruptcy Court Southern District of New York
CASE NO(S).:	10-05079
PLAINTIFF(S)	Irving H. Picard
DEFENDANT(S):	ESTATE OF JAMES M. GOODMAN; and AUDREY GOODMAN, individually, and in her capacity as Personal Representative of the Estate of James M. Goodman
DOCUMENT BEING SERVED:	<ul style="list-style-type: none">- Amended Responses and Objections of Audrey Goodman to Trustee's First Request for Production of Documents;- Amended Responses and Objections of Audrey Goodman to Trustee's First Set of Interrogatories with Verificaiton;- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Set of Interrogatories with Verificaiton; and- Amended Responses and Objections of Audrey Goodman as Personal Representaitve of the Estate of James M. Goodman to Trustee's First Request for Produciton of Documents
SENDER'S NAME:	Helen Davis Chaitman, Esq. / Sarah Howell
SENDER'S TELEPHONE NO.:	888-759-1114

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